

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KESHAUN D. REESE,

Defendant.

Case No. 20-00301-01-CR-W-DGK

MOTION FOR DETENTION

Comes now the United States of America, by and through its undersigned counsel, and hereby moves this Court to order the detention of defendant Keshaun D. Reese, and states the following in support of the motion:

1. This motion is being made at the defendant's first appearance before a judicial officer. An Indictment has been filed charging the defendant with possession of a machinegun, in violation of 18 U.S.C. § 922(o).

2. This case involves the possession or use of a firearm as that term is defined in 18 U.S.C. § 921. *See* 18 U.S.C. § 3142(f)(1)(E).

3. The United States submits that there is clear and convincing evidence that there are no conditions which the Court could place on the defendant's release which would reasonably assure the defendant's appearance in Court and the safety of the community. *See* 18 U.S.C § 3142(g): (1) nature and circumstances of the offense; (2) weight of the evidence; (3) whether the defendant was on probation/parole at the time of the offense; and (4) danger to the community. Because of this, the United States requests that a Detention Hearing be held

and that the defendant be detained. *See, e.g., United States v. Sazenski*, 806 F.2d 846, 848 (8th Cir. 1986); *United States v. Warren*, 787 F.2d 1237, 1238 (8th Cir. 1986).

WHEREFORE, based on the foregoing, the United States requests that the Court hold a Detention Hearing in accordance with 18 U.S.C. § 3142(f), and following such hearing, order the detention of the defendant.

Respectfully submitted,

Timothy A. Garrison
United States Attorney

By /s/Jeffrey Q. McCarther

Jeffrey Q. McCarther
Assistant United States Attorney
Violent Crime & Drug Trafficking Unit
Charles Evans Whittaker Courthouse
400 East Ninth Street, Suite 5510
Kansas City, Missouri 64106
Telephone: (816) 426-3122

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on October 22, 2020, to the CM-ECF system of the United States District Court for the Western District of Missouri, and a copy of the foregoing will be hand-delivered to the defendant at his first appearance before a judicial officer.

/s/Jeffrey Q. McCarther

Jeffrey Q. McCarther
Assistant United States Attorney